

EPA Registration #51311-3
Volume 2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

February 25, 2016

Dr. Matthew Brooks
Authorized Rep for HBC Chemical LLC
HBC Chemical LLC
c/o Ag-Chem Consulting
12208 Quinque Lane
Clifton, VA 20124

Subject: Notification per PRN 98-10 – Submission of alternate brand name: MothGuard
Moth Balls
Product Name: Mothguard Old Fashioned Moth Balls
EPA Registration Number: 51311-3
Application Date: February 1, 2016
Decision Number: 514103

Dear Dr. Brooks:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The alternate brand name MothGuard Moth Balls has been added to the product record.

If you have any questions, you may contact Dee Colby at 703-347-8657 or via email at Colby.deanna@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Marianne Lewis".

Marianne Lewis,
Acting Product Manager 07
Invertebrate & Vertebrate Branch 3
Registration Division (7505P)
Office of Pesticide Programs

Decision Information for 51311-3

Decision Seq: 514103

Action Code: 332,NOTIFICATION,30

FFS Start Date:

Tentative Ind: No

Start/Stop Clock

FQPA Clock:

Due Date: 20-Mar-2016

75-Day Due Date:

Days Elapsed:

OPP Target Due Date:

21-Day Due Date:

FFS Original Decision:

Negotiated Due Date:

45/90 Due Date:

Registrant Response

Due Date:

Predecisional

Due Date:

Add to Bundle?

Current Status: PENDING (22-Feb-2016)

Bundle ID:

Decision Status

Tracking

Create Resubmission

FFS Letters

Waiver Documentation

Action Code History

Secondary Decision

Decision Bundle

Decision Ownership Receipts Data Package Reduced Risk Meetings & Milestones FFS Information

75 Day Letters 45/90 Day Screen Primary Decisions Decision Milestone

FFS Negotiated Due Dates OPP Target Due Date Decision Comments Payment Unmatched Payments

Adding new ABN

Viewing Record 1 of 1

Print Setup

Printer

Name: \\W18H1N-OEIPS03\VA-PYS-7260

Status: Ready

Type: HP Color LaserJet 4700 PCL 6

Where: HP Color Laserjet 4700 (EZTech) in

Comment: HP Color LaserJet 4700 (EZTech) in

De

PM 7

Receipt for Section 3

S: 981473

Milestone Email:

Regulatory Type: Product Registration - Section 3

Resubmission ☐ Yes ☒ No

Application Type: Notification

Fee For Service: ☐ Yes ☒ No

Company: 51311 HBC CHEMICAL LLC.



Print Letter

Enter More Information

Tracking

Risk Manager: Registration Division, Risk Management Team 7

Product #: 51311-3

Product Name: MOTHGUARD OLD FASHIONED MOTH BALL

Override#

Me Too Section3: 1475-39

Me Too Product Name: ENOZ PARA MOTH BALLS

Application Date: 01-Feb-2016

OPP Rec'd Date: 19-Feb-2016

Front End Date: 19-Feb-2016

Risk Manager Send Date: 19-Feb-2016

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Label Notification - ABN

New Ingredient

Request Date

New Ingredient

Received Date

Form A: ☐

Signature Date

Form B: ☐

Signature Date

Receipt Content

Paper Label

View/Edit

**AG-CHEM CONSULTING**

PESTICIDE SCIENCE AND REGISTRATION
12208 QUINQUE LANE, CLIFTON VA 20124
(703) 266-0128 MWBROOKS@AG-CHEM.COM
(703) 266-4377 FAX

February 1, 2016

Marianne Lewis
Product Manager 7
Office of Pesticide Programs (7508C)
Document Processing Desk
One Potomac Yard (South Building)
2777 S. Crystal Drive
Arlington, VA 22202

**Subject: Notification of Additional Brand Name: MothGuard Moth
Balls**
EPA Registration No. 51311-3

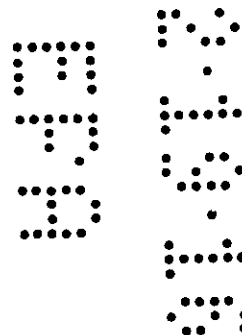
Dear Ms. Lewis

Ag-Chem Consulting, on behalf of HBC Chemical LLC, hereby submits the following notification of an additional brand name for its Mothguard Old Fashioned Moth Balls product. The additional name is Mothguard Moth Balls. A sample label is attached for your review.

Should you have any questions or require additional information, please do not hesitate to contact me at 703-266-0128.

Very Sincerely,

Dr. Matthew Brooks
Director, Ag-Chem Consulting
An Authorized Representative for HBC Chemical LLC





United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number HBC Chemical LLC / 51311-3	2. EPA Product Manager Marianne Lewis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) HBC Chemical LLC/ Mothguard Old Fashioned Moth Balls	PM# 07	
5. Name and Address of Applicant (Include ZIP Code) HBC Chemical LLC c/o Ag-Chem Consulting 12208 Quinque Lane Clifton Va 20124 <input checked="" type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification to Additional Brand Name- Mouthguard Moth Balls

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40CFR152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) plastic bag in box
* Certification must be submitted		If "Yes" Unit Packaging wgt. 2-24 oz	No. per container 6-12
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 4,5,7,10,12,14,16,24 oz	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		5. Location of Label Directions <input checked="" type="checkbox"/> printed on box	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Dr. Matthew Brooks	Title Consultant, Ag-Chem Consulting	Telephone No. (Include Area Code) 703-266-0128
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature	3. Title Regulatory Consultant	
4. Typed Name Matthew Brooks	5. Date 2-1-16	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

NOTIFICATION

OFFICE OF CHEMICAL, SAFETY
AND POLLUTION PREVENTION

DEC - 4 2013

HBC Chemical LLC
c/o
Matthew Brooks
Ag-Chem Consulting
12208 Quinque Lane
Clifton, VA 20124

Subject: Notification to add two additional Alternate Confidential Statements of Formula (CSFs)
EPA Registration No. 51311-3
Primary Brand Name: Mothguard Old Fashioned Moth Balls
Decision number: 485166
Submission Date: October 31, 2013

Dear Mr. Brooks,

The CSFs referred to above, submitted in connection with registration under FIFRA, are **acceptable**. A copy will be placed in our records. **Please note that the record for this product currently contains the following CSFs:**

- Basic CSF dated 10/22/10
- Alternate #1 dated 10/20/10
- Alternate #2 dated 10/20/10
- Alternate #3 dated 10/20/10
- Alternate #4 dated 10/22/10
- Alternate #5 dated 02/28/12
- Alternate #6 dated 02/28/12
- Alternate #7 dated 02/28/12
- Alternate #8 dated 02/28/12
- Alternate #9 dated 02/28/12
- Alternate #10 dated 10/31/13
- Alternate #11 dated 10/31/13

Any previously dated CSFs are superseded. If you have any questions, please contact me at 703-347-0235 or benbow.gene@epa.gov.

Sincerely,

Gene Benbow
Wildlife Biologist
Insecticide-Rodenticide Branch
Registration Division (7505P)



AG-CHEM CONSULTING

PESTICIDE SCIENCE AND REGISTRATION
12208 QUINQUE LANE, CLIFTON VA 20124
(703) 266-0128 MWBROOKS@AG-CHEM.COM
(703) 266-4377 FAX

October 31, 2012.

Reuben Baris
Product Manager 7
Insecticide Branch
Registration Division (7505P)
One Potomac Yard (South Building)
2777 S. Crystal Drive
Arlington, VA 22202

Subject: Mothguard Old Fashioned Moth Balls
Notification to add Alternate CSFs
EPA Reg. No. 51311-3

Dear Mr. Baris,

Ag-Chem Consulting, on behalf of HBC Chemical LLC, hereby submits the following notification to add Alternate CSFs 10 and 11. We are adding an alternate source producer for the active ingredient, p-dichlorobenzene. This source, [REDACTED]

Should you have any questions or require additional information, please do not hesitate to contact me at 703-266-0128.

Very Sincerely,

Dr. Matthew Brooks
Director, Ag-Chem Consulting
An Authorized Representative for HBC Chemical LLC

Product ingredient source information may be entitled to confidential treatment



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number HBC Chemical LLC / 51311-3	2. EPA Product Manager Reuben Baris	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) HBC Chemical LLC/ Mothguard Old Fashioned Moth Balls	PM# 07	
5. Name and Address of Applicant (Include ZIP Code) HBC Chemical LLC c/o Ag-Chem Consulting 12208 Quinque Lane Clifton Va 20124 <input checked="" type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification to add alternate CSFs 10 and 11 using another registered source for the product.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) plastic bag in box	
* Certification must be submitted		If "Yes" Unit Packaging wgt. 2-24 oz	No. per container 6-12	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 4,5,7,10,12,14,16,24 oz		5. Location of Label Directions <input checked="" type="checkbox"/> printed on box	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Dr. Matthew Brooks		Title Consultant, Ag-Chem Consulting		Telephone No. (Include Area Code) 703-266-0128	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Regulatory Consultant			
4. Typed Name Matthew Brooks		5. Date 10-31-13			



United States
Environmental Protection Agency
Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address HBC Chemical c/o Ag-Chem Consulting 12208 Quinque Lane Clifton VA 20124	EPA File Symbol/Registration Number 51311-3 <hr/> Product Name Mothguard Old Fashioned Moth Balls <hr/> Date of Confidential Statement of Formula (EPA Form 8570-4) 10-31-13
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As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

p-dichlorodenzene

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another producer, and is labeled for at least each use for which my product is proposed to be labeled.

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF) (EPA Form 8570-4) referenced above and on file with the EPA is complete, current, and accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source

Active Ingredient	Product Name	Registration Number
p-dichlorobenzene	[REDACTED]	[REDACTED]
Signature 	Name and Title Matthew Brooks, Regulatory Consultant	Date 10-31-13

